

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 8 CASES LISTED IN
EXHIBIT A OF DEFENSE MOTION TO
EXCLUDE OPINIONS AND TESTIMONY
OF DR. VLADIMIR IAKOVLEV (Dkt.
6874)

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**PLAINTIFFS' ADOPTION OF PRIOR DAUBERT RESPONSE AND OPPOSITION TO
DEFENDANT ETHICON'S MOTION TO EXCLUDE THE OPINIONS AND
TESTIMONY OF DR. VLADIMIR IAKOVLEV FOR WAVE 8**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert response filed against Vladimir Iakovlev, M.D. for Ethicon Wave 4, Dkt. 3790 regarding monofilament polypropylene mesh previously disclosed in this litigation. Plaintiffs respectfully request that the Court deny Defendants' adopted motion regarding monofilament polypropylene mesh previously disclosed in this litigation, for the reasons expressed in the Wave 4 response briefing.

As to Defendants' motion regarding Mersilene mesh, leadership hereby adopts the Response filed this day in the case *Cheryl Berden et al. v. Ethicon, Inc. et al.*, Case No. 2:14-cv-21966.¹

¹ Response in *Cheryl Berden et al. v. Ethicon, Inc. et al.*, Case No. 2:14-cv-21966 not filed as of the time of this filing. This document will be amended for docket number once filed.

Dated: October 25, 2018

Respectfully submitted,

/s/ D. Renee Baggett

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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
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